REMARKS

This Amendment is filed in response to the non-final Office Action of June 30, 2009 in which claims 1-20 were rejected.

According to the presently amended claims 1, 8, 15 and 16 an electroconductive metal element comprises an outlet that constantly connect the electroconductive metal element to ground. Constant connection means that the connection is always-on so that the connection is never interrupted. This is opposed to intermittent connection where the connection is occasionally interrupted, i.e. switched on and off according to some condition. It is evident from figures 1-3 and specification (e.g. page 6, lines 1-6) that the (metal) outlet constantly connects the electroconductive metal element to ground. This applies to all embodiments described in the specification (page 7, lines 7-12, and page 8, lines 22-26). This feature allows a reliable, simple and economical shielding without any extra structural elements (page 4, lines 17-19).

Hong teaches an intermittent connection which is carried out using a non-ohmic device, such as a varistor. According to *Hong* (col. 3, lines 1-8) "A non-ohmic material acts as an insulator below the specific voltage ... and acts as an excellent conductor in voltage more than the specific voltage." Therefore, *Hong* does not teach that an outlet is configured to constantly connect the electroconductive metal element to ground as now claimed in claims 1, 8, 15 and 16.

Sherwood teaches an intermittent connection which is carried out using dielectric Mylar sheet. According to *Sherwood* (col. 4, lines 57-65) "when an electrostatic charge stored by subscriber's body exceeds the barrier potential established by the Mylar faceplate, it is discharged from his finger into the conductive surface 75 on the back of the face plate, and through pad 65, printed wire 63, a line 63' on circuit board, a wire of cable 24 and line 14 to ground for protecting the microprocessor." Therefore, similar to the non-ohmic material of *Hong*, the conductive surface acts as an excellent conductor in voltage more than the specific voltage and acts as an insulator below the specific voltage. Therefore, *Sherwood* does not teach that an outlet is configured to constantly connect the electroconductive metal element to ground as now disclosed in claims 1, 8, 15 and 16. On the other hand, *Sherwood* teaches (col. 4, lines 46-49) that "the cable 24 is

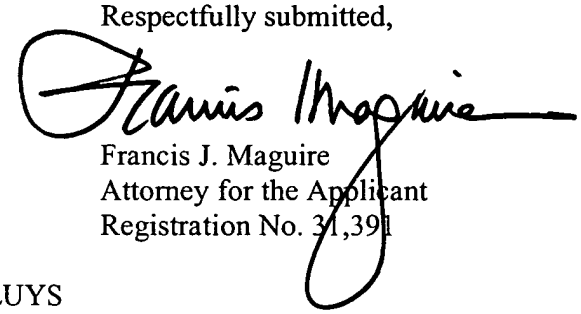
attached to the processor 10 and the plug 88 in the control unit for electrically connecting..." This means that the cable 24 can be unplugged from the plug 88. Therefore, *Sherwood* does not teach that an outlet is configured to constantly connect the electroconductive metal element to ground as now claimed in claims 1, 8, 15 and 16.

Wu teaches an intermittent connection which is carried out using a guard ring 130. According to *Wu* (col. 8, lines 2-4) "For typical assembly and test operations ..., the guard ring 130 is held at a fixed potential such as ground." *Wu* does not teach that for normal operation the guard ring 130 is held at a fixed potential such as ground. Thus, *Wu* does not disclose that for all operations (including normal, standby, assembly, test, etc. operations) the guard ring 130 is held at a fixed potential such as ground. Therefore, *Wu* does not disclose that an outlet is configured to constantly connect the electroconductive metal element to ground as now claimed in claims 1, 8, 15 and 16.

In accordance to above the invention now claimed in claims 1, 8, 15 and 16 is new and not obvious in view of *Hong*, *Sherwood* and *Wu*.

The objections and rejections of the Office Action of June 30, 2009, having been obviated by amendment or shown to be inapplicable, withdrawal thereof is requested and passage of claims 1-20 to issue is earnestly solicited.

Respectfully submitted,



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